REMARKS

This Application has been reviewed in light of the Final Office Action mailed October 28, 2010. All pending Claims 4-12, 14, 16 and 18 were rejected in the Office Action. Claims 1-3, 13, 15, and 17 were previously cancelled. Applicant respectfully requests reconsideration and allowance of all pending claims.

Rejections under 35 U.S.C. § 102

Claims 4-12, 14, 16, and 18 stand rejected by the Examiner under 35 U.S.C. §102(e) as being anticipated by *Saka* (U.S. Patent No. 7,519,910). Applicant respectfully traverses.

For a rejection under 35 U.S.C. §102, "[a] claim is anticipated only if **each and every element** as set forth in the claim is found, either expressly or inherently described, in a single prior art reference." *Verdegaal Bros. v. Union Oil Co. of California*, 814 F.2d 628, 631, 2 U.S.P.Q.2d 1051, 1053 (Fed. Cir. 1987). Furthermore, "**the identical invention must be shown in as complete detail** as is contained in the ... claim." *Richardson v. Suzuki Motor Co. Ltd.*, 868 F.2d 1226, 1236, 9 U.S.P.Q.2d 1913, 1920 (Fed. Cir. 1989).

Applicant respectfully submits that *Saka* does not teach "each and every element" or "the identical invention" as recited in Applicant's claims. In fact, **the Examiner explicitly admits that *Saka* does not teach every element of Applicant's claims**:

> While Saka shows *assembled display combining at least a portion of a display belonging to the object computer and at least a portion of a display belonging to the processing computer*, Sake does not specifically show *the object computer initiating a generating of* an *assembled display*. However Saka does teach that both the object (local, client) and the processing (remote, host) computers run Virtual Network Resource Sharing (VNRS) software. The VNRS software allows either the object (local, client) or the processing (remote, host) to manipulate the assembled display, see 2:44-48. Accordingly the limitation *the object computer initiating a generating of* an *assembled display* would have been obvious to a skilled artisan at the time of the invention was made have the teaching of Saka, since both the object and the processing computers run VNRS software and that either computers may serve as the host computer (2:42-44).

(Final Office Action, pages 3-4)

Thus, the Examiner explicitly admits that *Saka* does not teach "<u>the object computer initiating a generation</u>" of an assembled display, as recited in Applicant's claims. Therefore, *Saka* cannot anticipate Applicant's claims, and the rejections under 35 U.S.C. §102(e) are by definition improper and should be withdrawn.

Further, Applicant disagrees with the Examiner's argument that it would have been obvious for the object computer to initiate generating an assembled display because both the object (local, client) computer and the processing (remote, host) computer run Virtual Network Resources Sharing (VNRS) software, which allows either the object or processing computer to manipulate the assembled display.

First, even assuming that the VNRS would *make it technically possible* for the alleged object (local, client) computer to initiate generation of an assembled display, there is no evidence that it actually *would have been obvious to do so*. The Examiner does not articulate evidence of a motivation, or even any *reason*, for having the alleged object (local, client) computer initiate a generation of an assembled display. Rather, the Examiner merely alleges that it would have been obvious because "both the object and the processing computers run VNRS software and that either computers may serve as the host computer." Arguing that a modification is possible does not meet the legal burden of *articulating a reason* that the modification would have actually been obvious to one of ordinary skill in the art. The Supreme Court held in *KSR* that a claim composed of several elements is not proved obvious merely by demonstrating that each of its elements was, independently, known in the prior art. *KSR Int'l. Co. v. Teleflex Inc.*, 127 S.Ct. 1727, 1741 (2007). Rather, the Examiner must identify an apparent reason to combine the known elements in the fashion claimed. *Id.* "Rejections on obviousness grounds cannot be sustained by mere conclusory statements; instead, **there must be some articulated reasoning with some rational underpinning to support the legal conclusion of obviousness.**" *Id.*, citing *In re Kahn*, 441 F.3d 977, 988 (Fed. Cir. 2006). The Examiner has failed to provide the required articulate reason for the proposed modification/combination in this case, and thus has failed to provide a prima facie case of obviousness.

Second, contrary to the Examiner's assertions (as understood by Applicant), *Saka* does not teach that VRNS of either computer can initiate a display manipulation at the other computer. Rather, *Saka* teaches only that a first VNRS equipped computer allows a second computer's desktop to be displayed on the display of the first computer (see, e.g., *Saka* Abstract). In other words, *only the first computer can actively initiate the manipulation of its own display*. This is clearly different than allowing the second computer to initiate the manipulation of the display of a foreign computer, especially in view of security concerns, as would be known by one of ordinary skill in the art.

Thus, for at least the various reasons set forth above, Applicant respectfully submits that independent Claims 4, 7, and 10 are clearly distinguished from *Saka*. Accordingly, Applicant requests reconsideration and allowance of independent Claims 4, 7, and 10, as well as all claims that depend therefrom.

Further, various dependent claims are independently allowable over *Saka*. For example, dependent Claim 14 recites:

> wherein moving the object from the portion of the assembled display belonging to the object computer to the interaction area of the portion of the assembled display belonging to the processing computer automatically causes the display belonging to the processing computer to switch from displaying the at least a portion of the local object computer GUI to displaying the local processing computer GUI.

In the Final Office Action (pages 4-5), the Examiner argues with respect to Claim 14:

As for dependent claim 14:

Saka shows the *method according to claim 4, wherein moving the object from the portion of the assembled display belonging to the object computer to the interaction area of the portion of the assembled display belonging to the processing computer automatically causes the display belonging to the processing computer to switch from displaying the at least a portion of the local object computer GUI to displaying the local processing computer GUI* (Since Figure 12 shows a portion of both local and remote machine desktops at the same time, Saka teaches *displaying the at least a portion of the local object computer GUI to displaying the local processing computer GUI*).

Thus, the Examiner fails to even address the key feature of Claim 14 -- that **moving the object automatically causes the display to switch** from displaying the (full or partial) local object computer GUI to displaying the local processing computer GUI. Instead, as shown above, the Examiner merely alleges that *Saka* teaches switching of the display (which Applicant does not concede), but does not allege that such switching is **automatically caused by moving an object** belonging to the object computer to the interaction area of the portion of the assembled display belonging to the processing computer, as recited in Claim 14. Thus, the Examiner has failed to present a prima facie case of obviousness, and Claim 14 is thus allowable over *Saka*.

CONCLUSION

Applicant has made an earnest effort to place this case in condition for allowance in light of the remarks set forth above. Applicant respectfully requests reconsideration of the pending claims.

Applicant believes there are no fees due at this time. However, the Commissioner is hereby authorized to charge any fees necessary or credit any overpayment to Deposit Account No. 50-4871 of King & Spalding LLP.

If there are any matters concerning this Application that may be cleared up in a telephone conversation, please contact Applicant's attorney at 512.457.2030.

Respectfully submitted,
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